

Exhibit 1

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

SONYA LARSON

Plaintiff,

v.

DAWN DORLAND PERRY, et al.

Defendants.

Civil Action No.

1:19-cv-10203-IT

**AFFIDAVIT OF ANDREW D. EPSTEIN (1) IN OPPOSITION TO THE MOTION FOR
JUDGMENT ON THE PLEADINGS BY COHEN BUSINESS LAW GROUP AND
JEFFREY A. COHEN, ESQ., AND (2) IN SUPPORT OF PLAINTIFF'S MOTION FOR
LEAVE TO AMEND HER COMPLAINT**

I, Andrew D. Epstein, on oath depose and state as follows:

1. I am counsel in the above matter for the Plaintiff, Sonya Larson.
2. As a result of numerous Motions and requests for extensions of time, the Parties are still in very early stages of litigation. So far, Larson is the only Party who has conducted any discovery in this action other than initial disclosures.
3. On behalf of Larson, I served a request for documents on Defendant, Dawn Dorland Perry ("Dorland") on May 7, 2020. Dorland produced some documents on June 19, 2020, and promised to provide additional documents over two weeks ago but as of the date of this Affidavit has not done so.

4. Also, on behalf of Larson, I served a set of document requests and interrogatories on the "Cohen Defendants" (Cohen Business Law Group, PC and Jeffrey A. Cohen, Esquire) on June 26, 2020. The Cohen Defendants have about two weeks left to respond to this discovery.

Signed under the pains and penalties of perjury this 14th day of July 2020.

/s Andrew D. Epstein

Andrew D. Epstein

Certificate of Service

I certify that Plaintiff's Affidavit (1) In Opposition To the Motion for Judgment on the Pleadings By Cohen Business Law Group and Jeffrey A. Cohen, Esq., and (2) In Support Of Plaintiff's Motion For Leave To Amend Her Complaint was filed through the court's ECF system and a copy was sent electronically on the day it was filed to all counsel of record.

/s/ Andrew D. Epstein

Andrew D. Epstein

July 15, 2020